



Duke Energy Grays Harbor, LLC

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**ENERGY FACILITY SITE
EVALUATION COUNCIL**

GOCT-04-004
February 26, 2004

Mr. Mike Mills, Compliance Manager
Energy Facility Site Evaluation Council
925 Plum Street SE, Bldg. 4
Post Office Box 43172
Olympia, Washington 98504-3172

**SUBJECT: SUPPLEMENTAL INFORMATION REGARDING THE REQUEST FOR
EXTENSION AND MODIFICATION OF THE NOTICE OF
CONSTRUCTION/PREVENTION OF SIGNIFICANT
DETERIORATION (NOC/PSD) PERMIT TO CONSTRUCT SATSOP
COMBUSTION TURBINE PROJECT NO. EFSEC/2001-01
AMENDMENT 1**

REFERENCES: a) Letter dated January 19, 2004, Andrew H. McNeil and Laura Schinnell to Allen Fiksdal, Request for Extension and Modification of the Notice of Construction/Prevention of Significant Deterioration (NOC/PSD) Permit to Construct Satsop Combustion Turbine Project No. EFSEC/2001-01 Amendment 1
b) Letter dated January 28, 2004, Mike Mills to Andy McNeil and Laura Schinnell, Request to Extend and Amend the Notice of Construction/Prevention of Significant Deterioration Approval No. EFSEC/2001-01, Amendment 1

Dear Mr. Mills:

On behalf of Duke Energy Grays Harbor, LLC and Energy Northwest (hereafter referred to as Duke Energy), we are writing to respond to your January 28th letter (Reference b) requesting additional information.

The following information is being submitted per your request:

1. Supporting Cost Calculations for the proposed BACT determinations

Detailed cost calculations are enclosed for all BACT determinations, as described in detail below.

Mr. Mike Mills

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AND MODIFICATION TO THE NOC/PSD**

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2. Cost Analysis for NO_x BACT at 2.5 ppm and 2.0 ppm

As you are aware, Duke Energy accepted the 2.5 ppm short term and 2.0 ppm 24-hour NO_x emissions limits found in the current permit in light of concerns about regional visibility. Duke remains committed to complying with the previously established limits, but wants to make clear that those limits are not based on a cost-effectiveness BACT determination. In fact, the BACT analysis submitted in April 2001 did not include a cost-effectiveness analysis.

Our January 19, 2004 modification request provided a cost-effectiveness analysis demonstrating that a 3.0 ppm NO_x limit with a 10 ppm NH₃ slip is BACT. A copy of those cost calculations is provided as Attachment 1 to this letter.

At your request, we have also prepared a cost-effectiveness analysis for 2.5 ppm and 2.0 ppm NO_x limits. The revised cost analysis for the 2.5 ppm and 2.0 ppm NO_x limits also takes into account the 5.0 ppm NH₃ limit.

It is important to keep in mind that the Grays Harbor facility is partially constructed. As a result, the case-by-case BACT analysis must take into account any retrofitting or additional operating costs that would be required to meet a level of emission control beyond that provided by the original design.

Initially, the Grays Harbor SCR was designed to achieve a 2.5 ppm NO_x emissions limit with a 10.0 ppm NH₃ slip. If that original system were operated in order to achieve a 2.0 ppm 24-hour NO_x limit with a 5.0 ppm NH₃ slip, the operational costs would increase by approximately \$510,100 per year. This would be an estimated incremental cost of \$12,750 per ton of NO_x removed. This incremental cost was calculated based on the increased operating cost divided by the additional NO_x removed (40 tons). These cost calculations are provided as Attachment 2.

Prior to construction, the Grays Harbor SCR catalyst design was changed to achieve a 2.5 ppm NO_x emissions limit with a 5.0 PPM NH₃ slip. In order to operate this system at a 2.0 ppm 24-hour NO_x limit with a 5.0 ppm NH₃ slip, the operational costs would increase by approximately \$233,000 per year, with an estimated incremental cost of \$5,800 per ton of NO_x removed. The incremental cost was calculated based on the increased operating cost divided by the additional NO_x removed (40 tons). These cost calculations are provided as Attachment 3.

3. Details on CO BACT Analysis

As explained in our Request for Extension and Modification dated January 19, 2004 we have reevaluated BACT for CO control in light of recent data indicating that emissions from GE 7FA turbines, without any post-combustion control, are much lower than previously believed. The

Mr. Mike Mills

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previous BACT analysis assumed that emissions, without post-combustion control, would be 22.6 ppm, making the use of catalytic oxidation technology to reduce emissions to 2 ppm appear to be cost-effective. However, recent data indicates that turbine emissions are much lower than previously assumed.

Duke has compiled CO emissions data (Attachment 4) from our Duke Energy Washington, LLC, facility located in Beverly Ohio (PSD Permit # 0684000212). The data that were collected by the Continuous Emissions Monitors (CEMs) are subject to the QA/QC requirements of 40 CFR 60 Appendix F. During normal operations, the emissions were consistently less than 3.0 ppm. The data clearly demonstrate that the turbines with duct burners can achieve a 6.0 ppm emissions limit during normal operations without a CO catalyst.

However, operating data for a GE 7FA with duct burners is limited. During the almost 400 turbine operating hours at the Washington Energy Facility, the duct burners operated over 50% of the time (280 hours of duct burner operation). Although the majority of the data is below 1.5 ppm @ 15% O₂, it should be acknowledged that this data is from a recently constructed facility. As the equipment ages, an increase in CO emissions is to be expected.

The 6.0 ppm BACT determination and the 4.0 ppm proposed emissions limit are intended to accommodate slight changes in emissions as a result of normal equipment aging and maintenance activity. Duke Energy will design the turbines to accommodate a CO catalyst in the event that the facility experiences difficulty achieving the 4.0 ppm CO emissions limit.

The cost calculations supporting the revised CO catalyst BACT analysis are provided in Attachment 5. These cost calculations are based on a CO emissions rate of 6.0 ppm.

4. Details on VOC BACT Analysis

Duke Energy has attached summary copies (Attachment 6) of emissions testing conducted at the Washington Energy Facility for VOC emissions. The attached Washington data is representative of VOC emissions testing at other Duke Energy facilities. Duke Energy can supply additional test data if needed.

Thank you for your time and consideration and we look forward to meeting with you on March 11, 2004 to discuss the revised BACT and supporting information so that a timely resolution may be reached. Please contact Mr. Craig Bressan at (704) 382-6507 or Mr. Andy McNeil at (360) 482-4345 if you have any questions or require additional information.

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Respectfully submitted,

Andrew H McNeil by Laura Schinnell

Duke Energy Grays Harbor, LLC
By Andrew H. McNeil, Project Director

Laura Schinnell

Energy Northwest
By Laura Schinnell, Project Scientist

cc: Mr. Alan Newman, P.E. – Department of Ecology

Enclosures: Attachment 1, Cost Analysis for 3.0 ppm NOx Limit with a 10 ppm NH₃ Slip
Attachment 2, Cost Analysis, Facility Designed for 2.5 ppm NOx Limit with a
10 ppm NH₃ Slip, Operated at 2.0 ppm NOx Limit and 5 ppm NH₃ Slip
Attachment 3, Cost Analysis for Facility Designed for 2.5 ppm NOx Limit with a
5 ppm NH₃ Slip, Operated at 2.0 ppm NOx Limit with a 5 ppm NH₃ Slip
Attachment 4, CO Emissions Data from Duke Energy Washington, LLC
Attachment 5, Cost Analysis for 6.0 ppm CO Emissions Rate
Attachment 6, Summary Copies of Emissions Testing for VOC Emissions

Attachment 1

Cost Analysis for 3.0 ppm NO_x Limit with a 10 ppm NH₃ Slip

Attachment 1

Cost Analysis for 3.0 ppm NO_x Limit with a 10 ppm NH₃ Slip Selective Catalytic Reduction (SCR) Cost Estimates

Capital Costs per Turbine

	Items	Value	Basis
Purchased Equipment	Equipment costs	\$ 2,037,250	Vendor Quote = A
	Instruments	\$ 203,700	0.10*A
	Sales tax	\$ 142,600	0.07*A
	Freight	\$ 101,900	0.05*A
	Total Equipment costs	\$2,485,450	B = 1.22*A
Direct Installation Cost	Foundations and Supports	\$ 198,800	0.08*B
	Handling and Erecting	\$ 348,000	0.14*B
	Electrical	\$ 99,400	0.04*B
	Piping	\$ 49,700	0.01*B
	Insulation	\$ 24,900	0.01*B
	Painting	\$ 24,900	0.01*B
	Total installation costs	\$ 745,700	0.30*B
Total Direct Costs		\$ 3,231,200	
Indirect costs (installation)	Engineering	\$248,500	0.10*B
	Construction/field expense	\$124,300	0.05*B
	Contractor fees	\$248,500	0.10*B
	Start-up	\$49,700	0.02*B
	Performance tests	\$24,900	0.01*B
	Contingencies	\$61,120	0.03*B
	Total construction	\$ 770,490	0.31*B
Total Capital Investment Costs		\$4,001,690	

Attachment 1

Operating Costs per Turbine

Item	Value	Basis	Source
Electricity	3.0	Pressure Drop	Vendor
Pressure Drop (in. WC)	180,000		
Power Output of Turbine (kW)	0.3%	0.1% per I in.	Vendor
Power Loss Due to Pressure drop (kW)	540		
Unit Cost (\$/kWh)	\$0.045		Estimate
Cost (\$/yr) (based on 4,000 hours)	\$97,200		
Operating Labor	\$90,090		OAQPS
Supervisory Labor	\$13,510		OAQPS
Maintenance			
Labor	0.5	¼ hr per shift	OAQPS
Analyzer labor	0.04		
Catalyst replacement labor	0.1	40 hr./yr	
Unit cost(\$/hr)	\$35.00		
Labor Costs (\$/yr)	\$25,620		
Material Costs (\$/yr)	\$21,960		OAQPS
Total Costs (\$/yr)	\$47,580		
Ammonia Requirement			
Ton/yr	44		Vendor
Unit cost	\$315		Peoples Gas
Total Cost	\$13,930		
Process Air			
Requirement (scf/lb NH ₃)	350		Vendor
Requirement (Mscf/yr)	69,643		Vendor
Unit Cost (\$/Mscf)	\$0.20	Peters Timmerhaus	Standard
Total Cost (\$/yr)	\$13,930		
Catalyst Replacement			
Catalyst Costs	\$384,130	Catalyst	Vendor
Annual Cost (\$/yr) (3 year life)	\$146,370		OAQPS
Indirect Annual Costs			
Overhead	\$86,916		OAQPS
Administrative	\$88,458		OAQPS
Property Tax	\$44,229		OAQPS
Insurance	\$44,229		OAQPS
Capital Recovery	\$576,191		OAQPS
Total Indirect (\$/yr)	\$795,794		OAQPS
Total Annualized Cost (\$/yr)	\$1,218,404		

OAQPS – Office of Air Quality Planning and Standards

Attachment 2

Cost Analysis

Facility Designed for 2.5 ppm NO_x Limit with a 10 ppm NH₃ Slip
Operated at 2.0 ppm NO_x Limit with a 5 ppm NH₃ Slip

Attachment 2

Selective Catalytic Reduction (SCR) Cost Estimates Facility Design 2.5 ppm NO_x 10.0 ppm NH₃ slip 2.0 ppm NO_x 5.0 ppm NH₃ slip

Capital Costs per Turbine

	Items	Value	Basis
Purchased Equipment	Equipment costs	\$ 2,296,620	Vendor Quote = A
	Instruments	\$ 229,662	0.10*A
	Sales tax	\$ 160,763	0.07*A
	Freight	\$ 114,831	0.05*A
	Total Equipment costs	\$2,801,876	B = 1.22*A
Direct Installation Cost	Foundations and Supports	\$ 224,150	0.08*B
	Handling and Erecting	\$ 392,263	0.14*B
	Electrical	\$ 112,075	0.04*B
	Piping	\$ 56,036	0.02*B
	Insulation	\$ 28,018	0.01*B
	Painting	\$ 28,018	0.01*B
	Total installation costs	\$ 840,563	0.30*B
Total Direct Costs		\$ 3,642,440	
Indirect costs (installation)	Engineering	\$280,188	0.10*B
	Construction/field expense	\$140,094	0.05*B
	Contractor fees	\$280,188	0.10*B
	Start-up	\$56,038	0.02*B
	Performance tests	\$28,019	0.01*B
	Contingencies	\$84,056	0.03*B
	Total construction	\$ 868,582	0.31*B
Total Capital Investment Costs		\$4,511,022	

Attachment 2

Operating Costs per Turbine

Item	Value	Basis	Source
Electricity	3.8	Pressure Drop	Vendor
Pressure Drop (in. WC)	180,000		
Power Output of Turbine (kW)	0.38%	0.1% per I in.	Vendor
Power Loss Due to Pressure drop (kW)	684		
Unit Cost (\$/kWh)	\$0.045		Estimate
Cost (\$/yr) (based on 4,000 hours)	\$123,120		
Operating Labor	\$90,090		OAQPS
Supervisory Labor	\$13,510		OAQPS
Maintenance			
Labor	0.5	½ hr per shift	OAQPS
Analyzer labor	0.04		
Catalyst replacement labor	0.1	40 hr./yr	
Unit cost(\$/hr)	\$35.00		
Labor Costs (\$/yr)	\$25,620		
Material Costs (\$/yr)	\$21,960		OAQPS
Total Costs (\$/yr)	\$47,580		
Ammonia Requirement			
Ton/yr	59		Vendor
Unit cost	\$315		Peoples Gas
Total Cost	\$18,585		
Process Air			
Requirement (scf/lb NH3)	350		Vendor
Requirement (Mscf/yr)	69,643		Vendor
Unit Cost (\$/Mscf)	\$0.20	Peters Timmerhaus	Standard
Total Cost (\$/yr)	\$18,525		
Catalyst Replacement			
Catalyst Costs	\$643,500	Catalyst	Vendor
Annual Cost (\$/yr) (3 year life)	\$245,200		OAQPS
Indirect Annual Costs			
Overhead	\$86,916		OAQPS
Administrative	\$90,220		OAQPS
Property Tax	\$45,110		OAQPS
Insurance	\$45,110		OAQPS
Capital Recovery	\$627,500		OAQPS
Total Indirect (\$/yr)	\$894,856		OAQPS
Total Annualized Cost (\$/yr)	\$1,451,466		

OAQPS – Office of Air Quality Planning and Standards

Attachment 3

Cost Analysis

Facility Designed for 2.5 ppm NO_x Limit with a 5 ppm NH₃ Slip
Operated at 2.0 ppm NO_x Limit with a 5 ppm NH₃ Slip

Attachment 3

Selective Catalytic Reduction (SCR) Cost Estimates Facility Design 2.5 ppm NO_x 5.0 ppm NH₃ slip 2.0 ppm NO_x 5.0 ppm NH₃ slip*

Capital Costs per Turbine

	Items	Value	Basis
Purchased Equipment	Equipment costs	\$ 2,296,620	Vendor Quote = A
	Instruments	\$ 229,662	0.10*A
	Sales tax	\$ 160,763	0.07*A
	Freight	\$ 114,831	0.05*A
	Total Equipment costs	\$2,801,876	B = 1.22*A
Direct Installation Cost	Foundations and Supports	\$ 224,150	0.08*B
	Handling and Erecting	\$ 392,263	0.14*B
	Electrical	\$ 112,075	0.04*B
	Piping	\$ 56,036	0.02*B
	Insulation	\$ 28,018	0.01*B
	Painting	\$ 28,018	0.01*B
	Total installation costs	\$ 840,563	0.30*B
Total Direct Costs		\$ 3,642,440	
Indirect costs (installation)	Engineering	\$280,188	0.10*B
	Construction/field expense	\$140,094	0.05*B
	Contractor fees	\$280,188	0.10*B
	Start-up	\$56,038	0.02*B
	Performance tests	\$28,019	0.01*B
	Contingencies	\$84,056	0.03*B
	Total construction	\$ 868,582	0.31*B
Total Capital Investment Costs		\$4,511,022	

Attachment 3

Operating Costs per Turbine

Item	Value	Basis	Source
Electricity	3.8	Pressure Drop	Vendor
Pressure Drop (in. WC)	180,000		
Power Output of Turbine (kW)	0.38%	0.1% per I in.	Vendor
Power Loss Due to Pressure drop (kW)	684		
Unit Cost (\$/kWh)	\$0.045		Estimate
Cost (\$/yr) (based on 4,000 hours)	\$123,120		
Operating Labor	\$90,090		OAQPS
Supervisory Labor	\$13,510		OAQPS
Maintenance			
Labor	0.5	½ hr per shift	OAQPS
Analyzer labor	0.04		
Catalyst replacement labor	0.1	40 hr./yr	
Unit cost(\$/hr)	\$35.00		
Labor Costs (\$/yr)	\$25,620		
Material Costs (\$/yr)	\$21,960		OAQPS
Total Costs (\$/yr)	\$47,580		
Ammonia Requirement			
Ton/yr	59		Vendor
Unit cost	\$315		Peoples Gas
Total Cost	\$18,585		
Process Air			
Requirement (scf/lb NH ₃)	350		Vendor
Requirement (Mscf/yr)	69,643		Vendor
Unit Cost (\$/Mscf)	\$0.20	Peters Timmerhaus	Standard
Total Cost (\$/yr)	\$18,525		
Catalyst Replacement			
Catalyst Costs	\$643,500	Catalyst	Vendor
Annual Cost (\$/yr) (3 year life)	\$522,230		OAQPS
Indirect Annual Costs			
Overhead	\$86,916		OAQPS
Administrative	\$90,220		OAQPS
Property Tax	\$45,110		OAQPS
Insurance	\$45,110		OAQPS
Capital Recovery	\$627,500		OAQPS
Total Indirect (\$/yr)	\$894,856		OAQPS
Total Annualized Cost (\$/yr)	\$1,728,500		

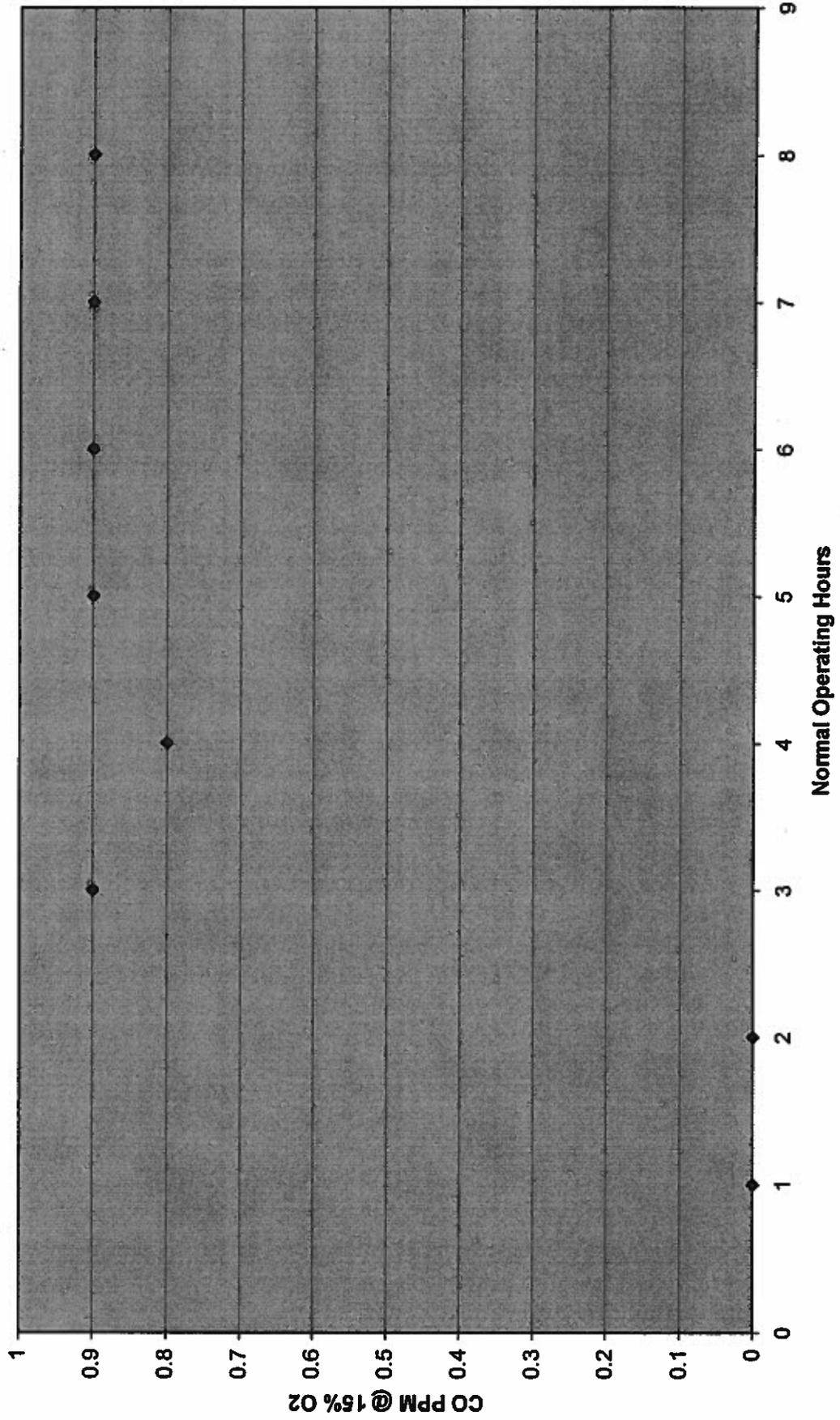
OAQPS – Office of Air Quality Planning and Standards

* Cost estimates based on a system that was designed to operate at 2.5 ppm NO_x and 10 ppm NH₃, but operated at 2.0 ppm NO_x and 5.0 ppm NH₃. Estimates based on vendor modeling.

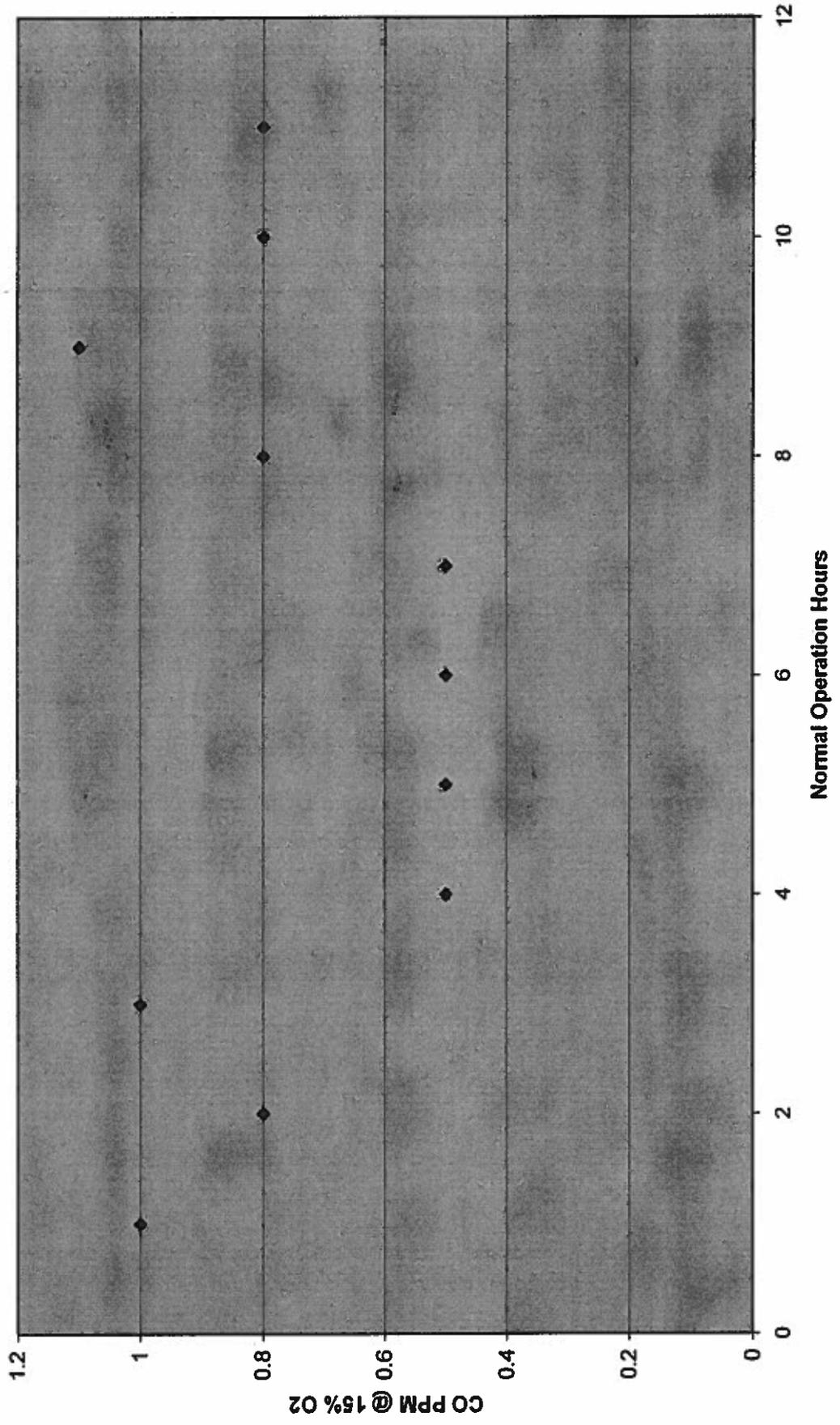
Attachment 4

CO Emissions Data from Duke Energy Washington, LLC

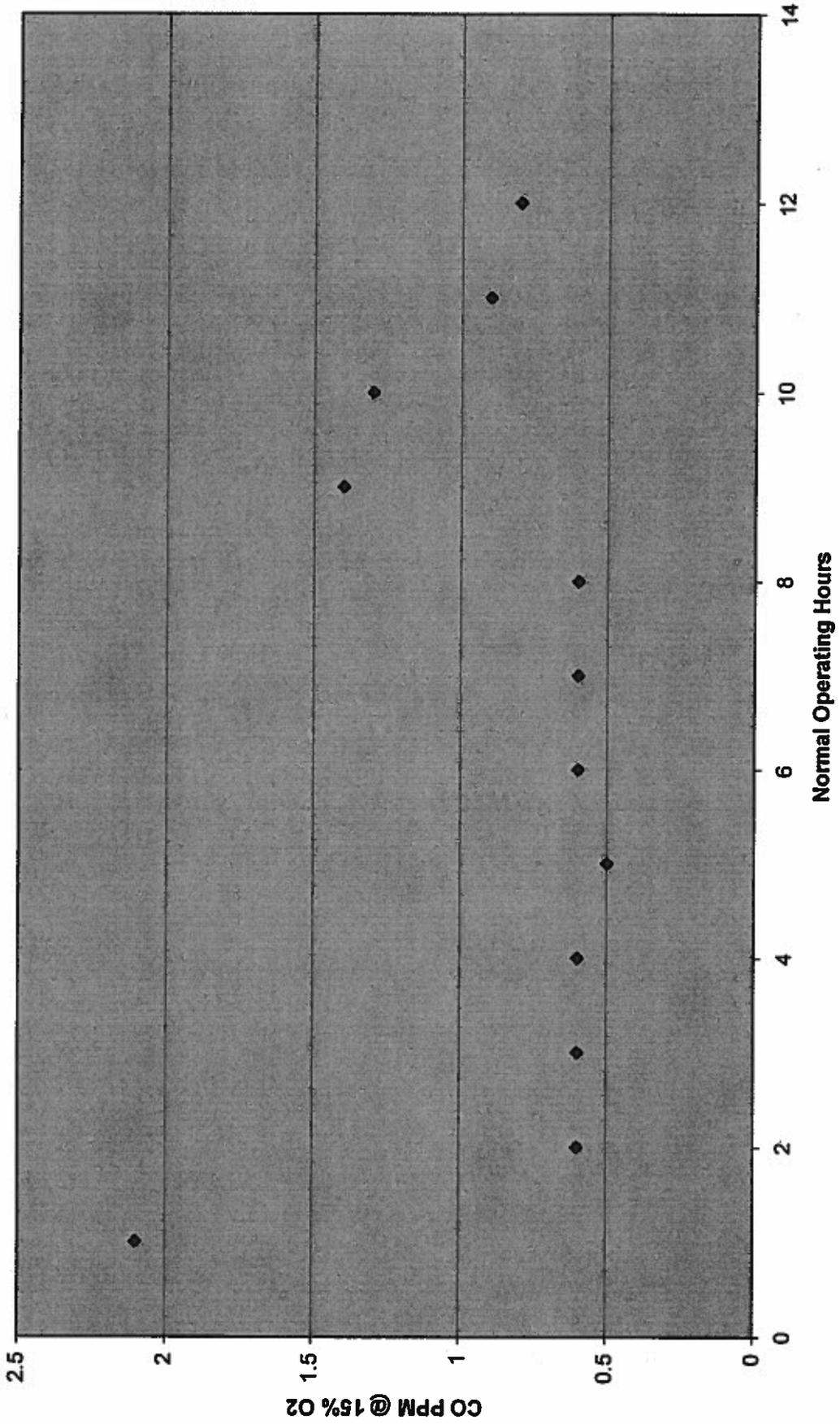
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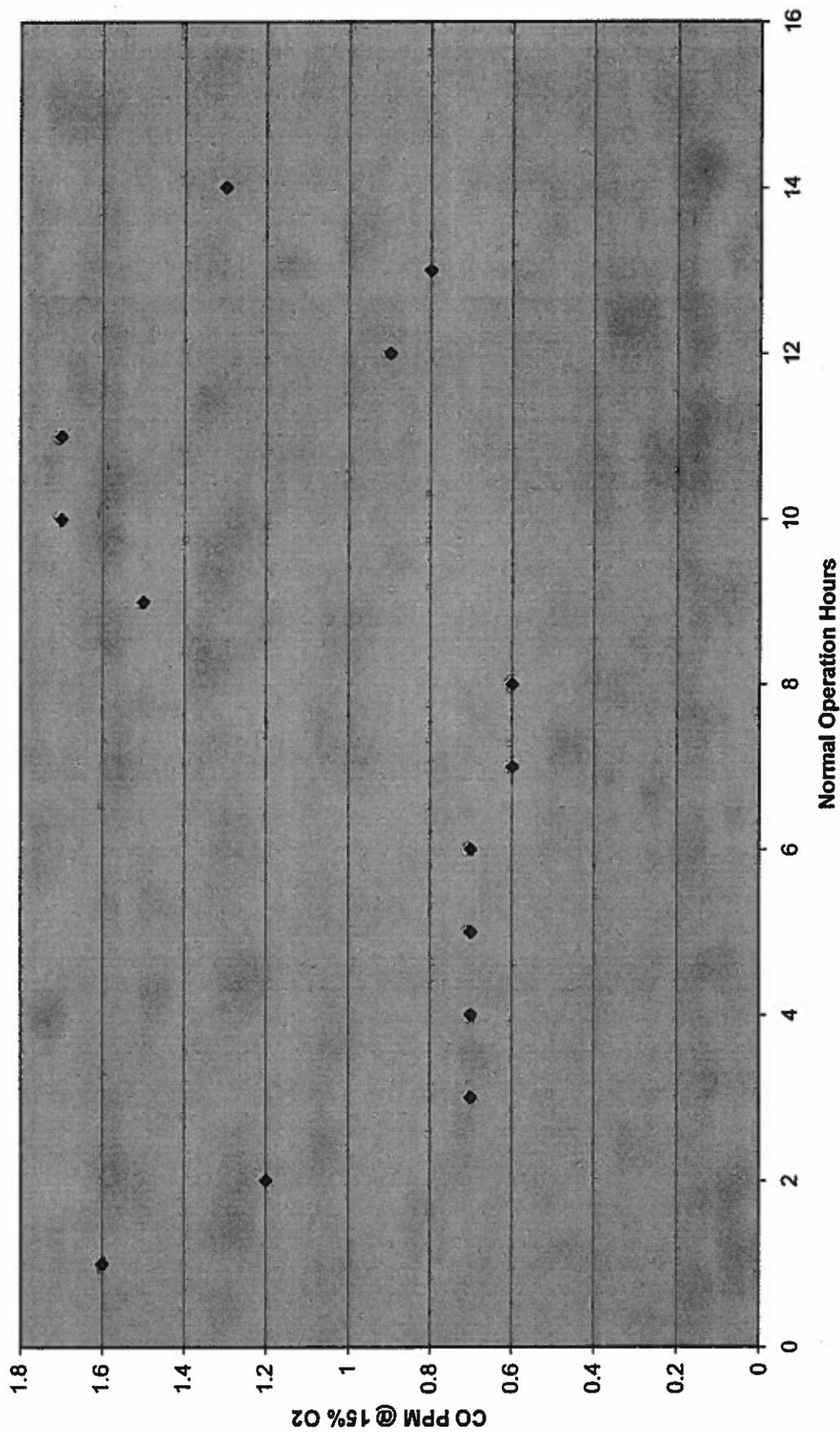
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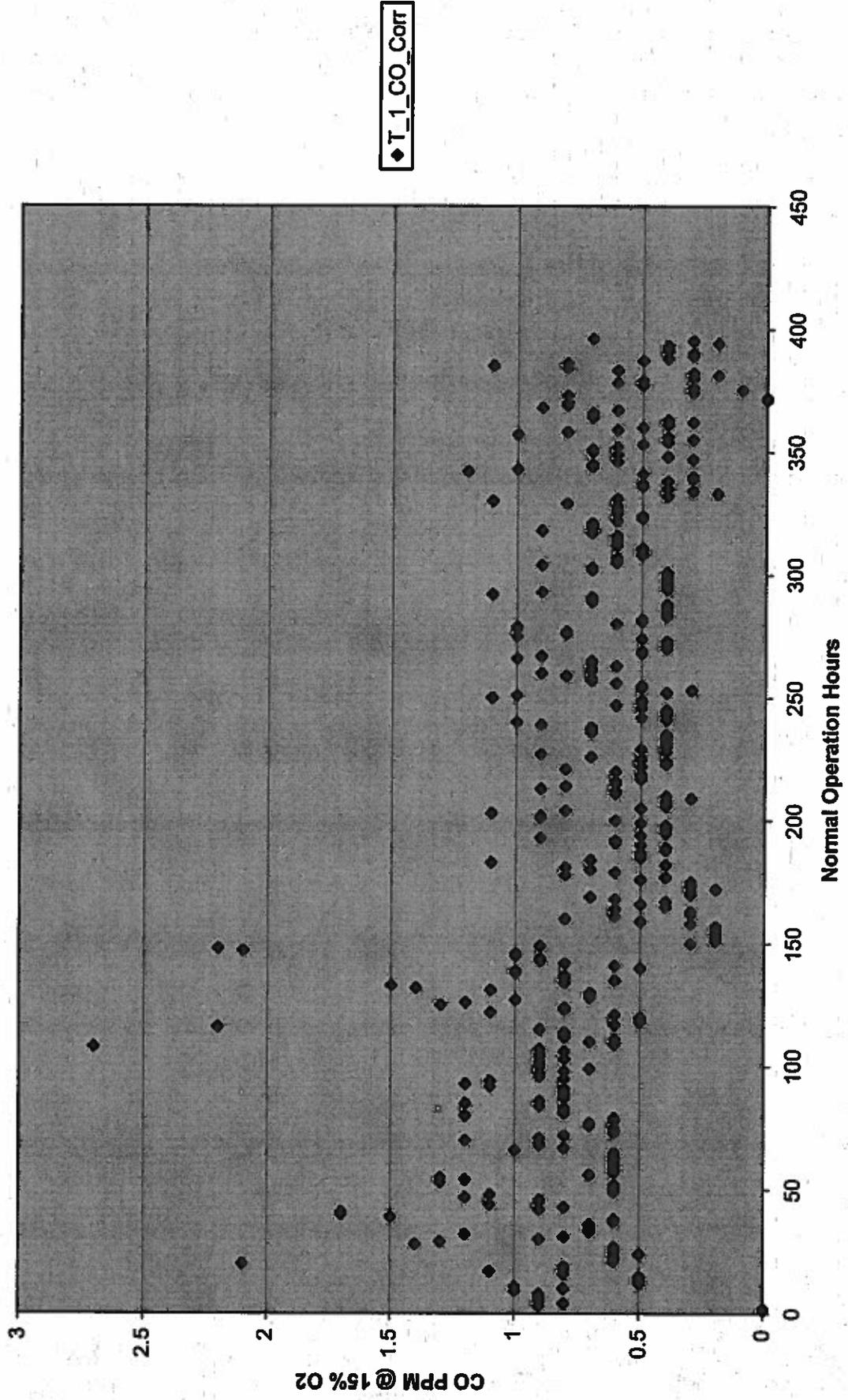
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Duke Energy Washington LLC 2003 Trend Data



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DATE	TIME	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100	101	102	103	104	105	106	107	108	109	110	111	112	113	114	115	116	117	118	119	120	121	122	123	124	125	126	127	128	129	130	131	132	133	134	135	136	137	138	139	140	141	142	143	144	145	146	147	148	149	150	151	152	153	154	155	156	157	158	159	160	161	162	163	164	165	166	167	168	169	170	171	172	173	174	175	176	177	178	179	180	181	182	183	184	185	186	187	188	189	190	191	192	193	194	195	196	197	198	199	200	201	202	203	204	205	206	207	208	209	210	211	212	213	214	215	216	217	218	219	220	221	222	223	224	225	226	227	228	229	230	231	232	233	234	235	236	237	238	239	240	241	242	243	244	245	246	247	248	249	250	251	252	253	254	255	256	257	258	259	260	261	262	263	264	265	266	267	268	269	270	271	272	273	274	275	276	277	278	279	280	281	282	283	284	285	286	287	288	289	290	291	292	293	294	295	296	297	298	299	300	301	302	303	304	305	306	307	308	309	310	311	312	313	314	315	316	317	318	319	320	321	322	323	324	325	326	327	328	329	330	331	332	333	334	335	336	337	338	339	340	341	342	343	344	345	346	347	348	349	350	351	352	353	354	355	356	357	358	359	360	361	362	363	364	365	366	367	368	369	370	371	372	373	374	375	376	377	378	379	380	381	382	383	384	385	386	387	388	389	390	391	392	393	394	395	396	397	398	399	400	401	402	403	404	405	406	407	408	409	410	411	412	413	414	415	416	417	418	419	420	421	422	423	424	425	426	427	428	429	430	431	432	433	434	435	436	437	438	439	440	441	442	443	444	445	446	447	448	449	450	451	452	453	454	455	456	457	458	459	460	461	462	463	464	465	466	467	468	469	470	471	472	473	474	475	476	477	478	479	480	481	482	483	484	485	486	487	488	489	490	491	492	493	494	495	496	497	498	499	500	501	502	503	504	505	506	507	508	509	510	511	512	513	514	515	516	517	518	519	520	521	522	523	524	525	526	527	528	529	530	531	532	533	534	535	536	537	538	539	540	541	542	543	544	545	546	547	548	549	550	551	552	553	554	555	556	557	558	559	560	561	562	563	564	565	566	567	568	569	570	571	572	573	574	575	576	577	578	579	580	581	582	583	584	585	586	587	588	589	590	591	592	593	594	595	596	597	598	599	600	601	602	603	604	605	606	607	608	609	610	611	612	613	614	615	616	617	618	619	620	621	622	623	624	625	626	627	628	629	630	631	632	633	634	635	636	637	638	639	640	641	642	643	644	645	646	647	648	649	650	651	652	653	654	655	656	657	658	659	660	661	662	663	664	665	666	667	668	669	670	671	672	673	674	675	676	677	678	679	680	681	682	683	684	685	686	687	688	689	690	691	692	693	694	695	696	697	698	699	700	701	702	703	704	705	706	707	708	709	710	711	712	713	714	715	716	717	718	719	720	721	722	723	724	725	726	727	728	729	730	731	732	733	734	735	736	737	738	739	740	741	742	743	744	745	746	747	748	749	750	751	752	753	754	755	756	757	758	759	760	761	762	763	764	765	766	767	768	769	770	771	772	773	774	775	776	777	778	779	780	781	782	783	784	785	786	787	788	789	790	791	792	793	794	795	796	797	798	799	800	801	802	803	804	805	806	807	808	809	810	811	812	813	814	815	816	817	818	819	820	821	822	823	824	825	826	827	828	829	830	831	832	833	834	835	836	837	838	839	840	841	842	843	844	845	846	847	848	849	850	851	852	853	854	855	856	857	858	859	860	861	862	863	864	865	866	867	868	869	870	871	872	873	874	875	876	877	878	879	880	881	882	883	884	885	886	887	888	889	890	891	892	893	894	895	896	897	898	899	900	901	902	903	904	905	906	907	908	909	910	911	912	913	914	915	916	917	918	919	920	921	922	923	924	925	926	927	928	929	930	931	932	933	934	935	936	937	938	939	940	941	942	943	944	945	946	947	948	949	950	951	952	953	954	955	956	957	958	959	960	961	962	963	964	965	966	967	968	969	970	971	972	973	974	975	976	977	978	979	980	981	982	983	984	985	986	987	988	989	990	991	992	993	994	995	996	997	998	999	1000	1001	1002	1003	1004	1005	1006	1007	1008	1009	1010	1011	1012	1013	1014	1015	1016	1017	1018	1019	1020	1021	1022	1023	1024	1025	1026	1027	1028	1029	1030	1031	1032	1033	1034	1035	1036	1037	1038	1039	1040	1041	1042	1043	1044	1045	1046	1047	1048	1049	1050	1051	1052	1053	1054	1055	1056	1057	1058	1059	1060	1061	1062	1063	1064	1065	1066	1067	1068	1069	1070	1071	1072	1073	1074	1075	1076	1077	1078	1079	1080	1081	1082	1083	1084	1085	1086	1087	1088	1089	1090	1091	1092	1093	1094	1095	1096	1097	1098	1099	1100	1101	1102	1103	1104	1105	1106	1107	1108	1109	1110	1111	1112	1113	1114	1115	1116	1117	1118	1119	1120	1121	1122	1123	1124	1125	1126	1127	1128	1129	1130	1131	1132	1133	1134	1135	1136	1137	1138	1139	1140	1141	1142	1143	1144	1145	1146	1147	1148	1149	1150	1151	1152	1153	1154	1155	1156	1157	1158	1159	1160	1161	1162	1163	1164	1165	1166	1167	1168	1169	1170	1171	1172	1173	1174	1175	1176	1177	1178	1179	1180	1181	1182	1183	1184	1185	1186	1187	1188	1189	1190	1191	1192	1193	1194	1195	1196	1197	1198	1199	1200	1201	1202	1203	1204	1205	1206	1207	1208	1209	1210	1211	1212	1213	1214	1215	1216	1217	1218	1219	12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exp_s1_hour

06/22/03 12:59:48	8	1.1	0	0.7	0	2314.2	0	0.0015	0	3.5	5	Normal Opera
06/22/03 13:59:50	8	0.9	0	0.8	0	2311.7	0	0.0013	0	3	5	Normal Opera
06/22/03 14:59:47	8	0.8	0	0.5	0	2310.7	0	0.0011	0	2.5	5	Normal Opera
06/22/03 15:59:48	8	0.8	0	0.5	0	2312.5	0	0.0011	0	2.5	5	Normal Opera
06/22/03 16:59:49	8	0.9	0	0.6	0	2315.3	0	0.0012	0	2.8	5	Normal Opera
06/22/03 17:59:48	8	0.9	0	0.8	0	2315.3	0	0.0012	0	2.8	5	Normal Opera
06/22/03 18:59:48	8	0.9	0	0.8	0	2315.3	0	0.0012	0	2.8	5	Normal Opera
06/22/03 19:59:48	8	1	0	0.8	0	2282.1	0	0.0014	0	3.2	5	Normal Opera
06/22/03 20:59:50	8	1	0	0.8	0	1618.8	0	0.0019	0	3.1	5	Normal Opera
06/25/03 10:59:48	8	1.5	0	1.1	0	2020.2	0	0.0024	0	4.8	5	Normal Opera
06/25/03 11:59:48	8	1	0	0.6	0	2258.9	0	0.0014	0	3.2	5	Normal Opera
06/25/03 12:59:51	8	0.6	0	0.4	0	2307.7	0	0.0008	0	1.8	5	Normal Opera
06/25/03 13:59:50	8	0.3	0	0.2	0	2308.8	0	0.0004	0	0.9	5	Normal Opera
06/25/03 14:59:50	8	0.5	0	0.3	0	2310.3	0	0.0007	0	1.8	5	Normal Opera
06/25/03 15:59:48	8	0.7	0	0.4	0	2311.5	0	0.001	0	2.3	5	Normal Opera
06/25/03 16:59:48	8	0.8	0	0.5	0	2309.4	0	0.0011	0	2.5	5	Normal Opera
06/25/03 17:59:48	8	0.6	0	0.4	0	2313.9	0	0.0011	0	2.5	5	Normal Opera
06/25/03 18:59:48	8	0.6	0	0.4	0	2310.3	0	0.0008	0	1.8	5	Normal Opera
06/25/03 19:59:48	8	0.5	0	0.3	0	2309.2	0	0.0007	0	1.6	5	Normal Opera
06/25/03 20:59:48	8	0.5	0	0.3	0	2306.5	0	0.0007	0	1.6	5	Normal Opera
06/25/03 21:59:47	8	0.7	0	0.5	0	2184.5	0	0.001	0	2.2	5	Normal Opera
06/28/03 07:59:50	8	1.4	0	1.2	0	1617.7	0	0.0026	0	4.3	5	Normal Opera
06/28/03 08:59:47	8	1.4	0	1	0	2046.1	0	0.0022	0	4.5	5	Normal Opera
06/28/03 09:59:48	8	1.1	0	0.7	0	2266.8	0	0.0016	0	3.8	5	Normal Opera
06/28/03 10:59:48	8	1.1	0	0.7	0	2311.4	0	0.0015	0	3.5	5	Normal Opera
06/28/03 11:59:48	8	0.9	0	0.6	0	2315.1	0	0.0013	0	3	5	Normal Opera
06/28/03 12:59:48	8	0.5	0	0.3	0	2318.1	0	0.0007	0	1.6	5	Normal Opera
06/28/03 13:59:49	8	0.7	0	0.4	0	2320.3	0	0.001	0	1.6	5	Normal Opera
06/28/03 14:59:48	8	1	0	0.6	0	2322.5	0	0.0014	0	2.3	5	Normal Opera
06/28/03 15:59:48	8	1.1	0	0.7	0	2324.9	0	0.0015	0	3.3	5	Normal Opera
06/28/03 16:59:48	8	1.1	0	0.7	0	2325	0	0.0015	0	3.5	5	Normal Opera
06/28/03 17:59:48	8	0.9	0	0.6	0	2325.4	0	0.0012	0	2.8	5	Normal Opera
06/28/03 18:59:51	8	0.8	0	0.5	0	2321.1	0	0.0011	0	2.6	5	Normal Opera
06/28/03 19:59:50	8	0.6	0	0.4	0	2320.6	0	0.0008	0	1.9	5	Normal Opera
06/28/03 20:59:48	8	0.5	0	0.3	0	2271.4	0	0.0007	0	1.6	5	Normal Opera
06/28/03 21:59:48	8	0.5	0	0.4	0	1637.8	0	0.0009	0	1.5	5	Normal Opera
06/27/03 08:59:48	8	1.2	0	1	0	1674.1	0	0.0022	0	3.7	5	Normal Opera
06/27/03 09:59:48	8	1.2	0	0.8	0	2050.2	0	0.0019	0	3.9	5	Normal Opera
06/27/03 10:59:48	8	0.9	0	0.6	0	2248.4	0	0.0013	0	2.9	5	Normal Opera
06/27/03 11:59:47	8	0.8	0	0.5	0	2335.5	0	0.0011	0	2.8	5	Normal Opera
06/27/03 12:59:50	8	0.6	0	0.4	0	2334.9	0	0.0008	0	1.9	5	Normal Opera
06/27/03 13:59:48	8	0.5	0	0.3	0	2331.7	0	0.0007	0	1.6	5	Normal Opera
06/27/03 14:59:48	8	0.6	0	0.4	0	2310.4	0	0.0008	0	1.8	5	Normal Opera
06/27/03 15:59:48	8	1.1	0	0.7	0	2311.5	0	0.0015	0	3.5	5	Normal Opera
06/27/03 16:59:49	8	1.1	0	0.7	0	2314.9	0	0.0015	0	3.5	5	Normal Opera
06/27/03 17:59:51	8	1.1	0	0.7	0	2318.9	0	0.0015	0	3.5	5	Normal Opera
06/27/03 18:59:50	8	1	0	0.6	0	2313.8	0	0.0014	0	3.2	5	Normal Opera
06/27/03 19:59:50	8	1.4	0	0.9	0	2321.3	0	0.0019	0	4.4	5	Normal Opera
06/27/03 20:59:47	8	1.2	0	0.8	0	2218.6	0	0.0017	0	3.8	5	Normal Opera
06/27/03 21:59:48	8	1	0	0.8	0	1561.6	0	0.0018	0	3	5	Normal Opera
06/28/03 08:59:48	8	0.9	0	0.6	0	1249.1	0	0.0015	0	3	5	Normal Opera
06/28/03 09:59:48	8	0.9	0	0.6	0	1640.8	98	0.0017	0	2.8	5	Normal Opera
06/28/03 10:59:48	8	1.1	0	0.8	0	2046.8	0	0.0017	0	3.5	5	Normal Opera
06/28/03 11:59:48	8	0.5	0	0.3	0	2281.5	0	0.0007	0	1.6	5	Normal Opera
06/28/03 12:59:48	8	0.2	0	0.1	0	2278.6	0	0.0003	0	0.7	5	Normal Opera
06/28/03 13:59:48	8	0.4	0	0.3	0	2275.7	0	0.0008	0	1.4	5	Normal Opera
06/28/03 14:59:48	8	0.8	0	0.5	0	2276.4	0	0.0011	0	2.5	5	Normal Opera
06/28/03 15:59:48	8	0.9	0	0.6	0	2245	0	0.0013	0	2.8	5	Normal Opera
06/28/03 16:59:47	8	0.8	0	0.5	0	2247.4	0	0.0011	0	2.5	5	Normal Opera
06/28/03 17:59:47	8	0.4	0	0.3	0	2247.3	0	0.0008	0	1.3	5	Normal Opera
06/28/03 18:59:50	8	0.3	0	0.2	0	2245.6	0	0.0004	0	0.9	5	Normal Opera
06/28/03 19:59:50	8	0.5	0	0.3	0	2218.9	0	0.0007	0	1.6	5	Normal Opera
06/28/03 20:59:48	8	0.7	0	0.6	0	1610.7	0	0.0013	0	2.1	5	Normal Opera
06/28/03 21:59:48	8	1	0	0.8	0	1250.3	0	0.0018	0	2.4	5	Normal Opera

Attachment 5

Cost Analysis for 6.0 ppm CO Emissions Rate

Attachment 5

Cost Analysis for 6.0 ppm CO Emissions Rate Carbon Monoxide Catalyst

Capital Costs per Turbine

	Items	Value	Basis
Purchased Equipment	Equipment costs	\$ 1,241,875	Vendor Quote = A
	Instruments	\$ 124,200	0.10*A
	Sales tax	\$ 86,900	0.07*A
	Freight	\$ 62,100	0.05*A
	Total Equipment costs	\$1,515,075	B = 1.22*A
Direct Installation Cost	Foundations and Supports	\$ 121,000	0.08*B
	Handling and Erecting	\$ 212,100	0.14*B
	Electrical	\$ 60,600	0.04*B
	Piping	\$ 30,300	0.01*B
	Insulation	\$ 15,200	0.01*B
	Painting	\$ 15,200	0.01*B
	Total installation costs	\$ 454,600	0.30*B
Total Direct Costs		\$ 1,969,700	
Indirect costs (installation)	Engineering	\$151,500	0.10*B
	Construction/field expense	\$75,800	0.05*B
	Contractor fees	\$151,500	0.10*B
	Start-up	\$30,000	0.02*B
	Performance tests	\$15,200	0.01*B
	Contingencies	\$45,500	0.03*B
	Total construction	\$ 469,800	0.31*B
Total Capital Investment Costs		\$2,439,500	

Attachment 5

Operating Costs per Turbine

Item	Value	Basis	Source
Electricity	3.0	Pressure Drop	Vendor
Pressure Drop (in. WC)	180,000		
Power Output of Turbine (kW)	0.3%	0.1% per I in.	Vendor
Power Loss Due to Pressure drop (kW)	540		
Unit Cost (\$/kWh)	\$0.045		Estimate
Cost (\$/yr) (based on 4,000 hours)	\$97,200		
Operating Labor	\$19,110		OAQPS
Supervisory Labor	\$2,870		OAQPS
Maintenance			
Labor	0.5	½ hr per shift	OAQPS
Analyzer labor	0.0		
Catalyst replacement labor	0.1	40 hr./yr	
Unit cost(\$/hr)	\$35.00		
Labor Costs (\$/yr)	\$24,230		
Material Costs (\$/yr)	\$24,230		OAQPS
Total Costs (\$/yr)	\$48,460		
Catalyst Replacement			
Catalyst Costs	\$359,000	Catalyst	Vendor
Annual Cost (\$/yr) (3 year life)	\$139,800		OAQPS
Indirect Annual Costs			
Overhead	\$42,260		OAQPS
Administrative	\$48,790		OAQPS
Property Tax	\$24,400		OAQPS
Insurance	\$24,400		OAQPS
Capital Recovery	\$296,220		OAQPS
Total Indirect (\$/yr)	\$414,070		OAQPS
Total Annualized Cost (\$/yr)	\$634,030		

OAQPS – Office of Air Quality Planning and Standards

Attachment 6

Summary Copies of Emissions Testing for VOC Emissions

Summary copies of emissions testing for VOC emissions

Feb-05-04 09:58am From-DUKE ENERGY

713 989 1717

T-941 P.001/002 F-037



GE ENERGY SERVICES

GE Mostardi Platt
888 Industrial Drive
Elmhurst, Illinois 60126
Ph: 630-530-6600, Fax: 630-530-6630

PARTICULATE AND GASEOUS EMISSIONS COMPLIANCE TEST

Performed At
Duke Energy Washington County, LLC
Washington Energy Facility
Units 1 and 2
Beverly, Ohio

Test Dates
July 10 through 12, 2002

Report No.
GE Mostardi Platt Report 20020410B

Report Submittal Date
August 9, 2002

Post-It® Fax Note	7671	Date	2/5/04	# of pages	2
To	CRAG BRESON		From	Pat McCabe	
Co./Dept.			Co.		
Phone #			Phone #		
Fax #			Fax #		

Summary copies of emissions testing for VOC emissions

Feb-05-04 08:56am

From-DUKE ENERGY

713 980 1717

T-941 P.002/002 F-037



GE ENERGY SERVICES

2.0 SUMMARY OF RESULTS

Complete test results are given on pages 9 through 18. The following table summarizes the test results.

Table 1: Baseload-Firing Pipeline Natural Gas

Parameter	Units	Unit 1			Unit 2		
		CT and DB	CT Only	DB Only ¹	CT and DB	CT Only	DB Only ²
NO _x	ppmvd @ 15% O ₂	2.76	2.85	0.0	2.78	2.86	0.0
	lbs/10 ⁶ Btu	0.0101	0.0104	0.0	0.0102	0.0105	0.0
	lbs/hr ²	23.42	18.55	4.87	24.28	19.10	5.18
CO	ppmvd @ 15% O ₂	0.28	0.17	0.11	0.15	0.44	0.0
	lbs/10 ⁶ Btu	0.0006	0.0004	0.0002	0.0003	0.0010	0.0
	lbs/hr ²	1.43	0.66	0.77	0.81	1.78	0.0
Formaldehyde	ppmvd	<0.11	<0.06	0.05	<0.07	<0.08	0.0
	lbs/10 ⁶ Btu	<0.000169	<0.000113	<0.000056	<0.000106	<0.000151	0.0
	lbs/hr ²	<0.39	<0.20	0.19	<0.26	<0.28	0.0
VOC (as CH ₄)	ppmvd @ 15% O ₂	0.11	0.62	0.0	0.14	0.47	0.0
	lbs/10 ⁶ Btu	0.0001	0.0008	0.0	0.0002	0.0006	0.0
	lbs/hr ²	0.33	1.41	0.0	0.43	1.08	0.0
Particulate ²	lbs/hr ²	1.723	2.444	0.0	3.449	2.066	1.383
	lbs/10 ⁶ Btu	0.0007	0.0013	0.0	0.0013	0.0011	0.0004
Opacity	%	0.0	0.0	0.0	0.0	0.0	0.0
Total Sulfur	gr/100cf as H ₂ S	0.03	0.03	N/A	0.03	0.03	N/A

¹Determined by subtracting average emissions with the duct burners off from the average emissions with duct burners on.

²Determined using volumetric air flow data collected in conjunction with each test.

Summary copies of emissions testing for VOC emissions

Table 3

Executive Summary of Results - Hanging Rock Energy Center

40 CFR 60, SUBPART GG			P003		P004		
Component	Limit	Units	Result	Percent of Allowable	Result	Percent of Allowable	
NOx	114.5	ppmvd @ ISO-day conditions	2.9	2.5%			
NOx	110	ppmvd @ ISO-day conditions			3.2	2.9%	
40 CFR 60, SUBPART Da							
	Limit	Units	Result	Percent of Allowable	Result	Percent of Allowable	
NOx	1.60	lbs/MW-hr	0.093	5.8%	0.087	5.4%	
SO2*	0.8	lbs/MMBtu	0.0151	1.9%	0.002	0.3%	
PM	0.03	lbs/MMBtu	0.001	3.3%	0.001	3.3%	
VE	20	%	0	0.0%	0	0.0%	
OEPA PERMIT No. 07-00503							
	Limit	Units	Result	Percent of Allowable	Result	Percent of Allowable	
Turbine Only	NOx	3	ppmvd @ 15% O2	2.6	86.7%	2.5	83.3%
	CO	9	ppmvd	0.2	2.2%	0.3	3.3%
	VE	10	%	0	0.0%	0	0.0%
	NOx	21.1	lbs/hr	16.7	79.1%	14.9	70.6%
	CO	25.7	lbs/hr	0.7	2.7%	1.1	4.3%
	HCHO	0.214	lbs/hr	0.03	14.0%	0.04	18.7%
	NH3	37.8	lbs/hr	0.12	0.3%	0.11	0.3%
	VOC	3.2	lbs/hr	0.21	6.6%	0.19	5.9%
	PM	23.3	lbs/hr	1.3	5.6%	5.9	25.3%
	SO2*	11.0	lbs/hr	3.4	30.9%	4.44	40.4%
Turbine plus Duct Burners	NOx	3	ppmvd @ 15% O2	3	100.0%	2.9	96.7%
	CO	9	ppmvd @ 15% O2	0.1	1.1%	0.1	1.1%
	VE	10	%	0	0.0%	0	0.0%
	NOx	0.08	lbs/MMBtu	0.011	13.8%	0.011	13.8%
	CO	0.08	lbs/MMBtu	0.0002	0.3%	0.0002	0.3%
	SO2*	0.8	lbs/MMBtu	0.0019	0.2%	0.0020	0.3%
	VOC	0.016	lbs/MMBtu	0.0001	0.6%	0.0001	0.6%
	PM	0.03	lbs/MMBtu	0.001	3.3%	0.001	3.3%
	NOx	27.8	lbs/hr	22.8	82.1%	24.34	87.6%
	CO	50.3	lbs/hr	0.4	0.8%	0.5	1.0%
	VOC	3.2	lbs/hr	0.19	5.9%	0.31	9.7%
	HCHO	0.258	lbs/hr	0.05	19.4%	0.03	11.6%
	NH3	37.8	lbs/hr	0.63	1.7%	0.22	0.6%
	PM	15	lbs/hr	2.8	18.7%	2.95	19.7%
SO2*	23.3	lbs/hr	4.07	17.5%	4.44	19.1%	

* Sulfur is determined from fuel analyses, assumes all sulfur oxidized to SO2